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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MICHELE VAN WINKLE,

**Plaintiff,**

VS.

GENERAL MOTORS COMPANY;  
GENERAL MOTORS LLC;  
DOES 1-10, inclusive; and ROE  
CORPORATIONS 1-10, inclusive.

Defendant.

Case No: 3:24-cv-00353-MMD-CSD

**STIPULATION AND ORDER TO  
CONTINUE DISCOVERY  
DEADLINES  
(SECOND REQUEST)**

21 Pursuant to LR 26-3 and Fed. R. Civ. P. 26(f), Plaintiff Michele Van Winkle and  
22 Defendants General Motors Company and General Motors LLC stipulate to continue by 90 days  
23 certain discovery deadlines in the Amended Proposed Discovery Plan and Scheduling Order (ECF  
24 No. 25). This is the Parties' second request for a discovery extension. The current request is  
25 being made because the medical and family underlying the Parties' first extension request have  
26 remained, causing limited ability of Plaintiff's counsel, Mr. Jung, to participate in this case's  
27 handling. This week, new counsel for Plaintiff joined the firm and will be taking over case  
28 handling in Mr. Jung's absence, the length of which is unknown.

## **I. DISCOVERY COMPLETED TO DATE**

The Parties have participated in the following discovery to date:

1. The Parties served their Initial Fed. R. Civ. P. 26(a)(1) Disclosures of Witnesses and Documents.
2. Defendants served their First Set of Interrogatories and Request for Production of Documents upon Plaintiff.
3. The Parties served their Designations of Expert Witnesses.
4. Plaintiff served her First Fed. R. Civ. P. 26(a)(1) Supplemental Disclosure.
5. Plaintiff served her responses to Defendants' First Set of Interrogatories and Request for Production of Documents.
6. Plaintiff served Written Discovery Requests to Defendants.

## II. **DISCOVERY REMAINING TO BE COMPLETED**

The following discovery remains to be completed:

1. The Parties to conduct the depositions of Plaintiff and Defendants' Fed. R. Civ. P. 30(b)(6) Designee(s), designated expert witnesses, and fact witnesses identified during discovery.
2. Defendants to respond to Plaintiff's Written Discovery Requests, due May 27, 2025.

III. REASONS WHY DISCOVERY HAS NOT BEEN  
COMPLETED WITHIN THE TIME FRAME OF THE DISCOVERY PLAN

Pursuant to Local Rule 26-3, good cause/excusable neglect exists for the requested extension. As explained in more detail in the Parties' first stipulated extension request, Mr. Jung was handling this matter for Plaintiff. At the time of the first request, Mr. Jung was experiencing medical and personal matters impacting his ability to complete discovery. Those issues have unfortunately continued. Recently, on May 19, 2025, new counsel was hired by Plaintiff's counsel's firm to take over handling of this and many other of Mr. Jung's cases. Ms. Wittig and Mr. Jung discussed case details on May 21, 2025, and Ms. Wittig immediately contacted Defendants' counsel to request another stipulated extension, which counsel graciously agreed to the current stipulation on May 23, 2025. Since the prior discovery extension, Plaintiff served

1 written discovery to Defendants, which responses are due May 27, 2025, and with his limited  
2 abilities since the first extension, was unable to participate in the remaining discovery needing to  
3 be completed. The current requested extension will provide the Parties with the necessary time  
4 to complete outstanding discovery, including party depositions and remaining written discovery.  
5 This Stipulation is made in good faith and not for the purpose of delay.

#### IV. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY

Based on the foregoing, the Parties agree to extend the discovery deadlines set forth in their Amended Proposed Discovery Plan and Scheduling Order (ECF No. 25) as follows below:

<b>Discovery Deadline</b>	<b>Current Deadline</b>	<b>Proposed Deadline</b>
Final Date to Amend Pleadings or Add Parties	December 2, 2024	No change.
Initial Expert Disclosures Deadline	December 30, 2024	No change.
Rebuttal Expert Disclosures Deadline	January 27, 2025	No change.
Discovery Cut-Off Date	May 27, 2025	August 25, 2025
Dispositive Motions Deadline	June 26, 2025	September 24, 2025
Proposed Joint Pre-Trial Order Deadline	July 28, 2025	October 27, 2025

## V. TRIAL DATE

The Court has not yet set a trial date in this matter. The Court shall set a trial date following the filing of a Proposed Joint Pre-Trial Order pursuant to LR 16-4.

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1 VI. **REQUEST NUMBER**  
23 This is the Parties' second request to extend the time to complete discovery.  
45 WHEREFORE, the Parties, by and through their respective undersigned counsel of record,  
6 stipulate to extend the discovery deadlines as outlined above. The Parties respectfully ask that the  
7 Court set the new discovery dates as stipulated above.8 **IT IS SO STIPULATED**  
910 Dated May 23, 2025.  
1112 **KEARNEY PUZEY DAMONTE**  
1314 */s/ Donna M. Wittig*  
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## **ORDER**

**IT IS HEREBY ORDERED** that the remaining discovery and pre-trial deadlines set forth in the Parties' Amended Proposed Discovery Plan and Scheduling Order (Docket No. 22) shall be continued to the following dates:

Discovery Cut-Off Date: **August 25, 2025**

Dispositive Motion Deadline: **September 24, 2025**

Proposed Joint Pre-Trial Order Deadline: **October 27, 2025**

The Court has not yet set a trial date in this matter. The Court shall set a trial date following the filing of a Proposed Joint Pre-Trial Order pursuant to LR 16-4.

## IT IS SO ORDERED.

CSQ  
UNITED STATES MAGISTRATE

UNITED STATES MAGISTRATE JUDGE

**DATED:** May 23, 2025